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27

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COLLEGE OF THE LAW, SAN
FRANCISCO a public trust and
institution of higher education
duly organized under the laws
and the Constitution of the
State of California;
FALLON VICTORIA, an
individual;
RENE DENIS, an individual;
TENDERLOIN MERCHANTS
AND PROPERTY
ASSOCIATION, a business
association;
RANDY HUGHES, an individual;
and
KRISTEN VILLALOBOS, an
individual,

Plaintiffs,

v.

CITY AND COUNTY OF SAN
FRANCISCO, a municipal
entity,

Defendant.

Case No. 4:20-cv-03033-JST

DECLARATION LINDON LILLY

**ASSIGNED FOR ALL PURPOSES
TO THE HONORABLE JON S.
TIGAR**

Trial Date: (None set yet)

DECLARATION OF LINDON LILLY

I, Lindon Lilly, declare as follows:

1. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration based in support of plaintiffs' motion to enforce the stipulated injunction.

2. I am a private investigator licensed by the State of California Bureau of Security and Investigative Services. My BSIS license number is 188947. I am the Founder and Chief Executive Officer of Rhino Investigation and Rhino Processing Services. I am a two-term governor of the California Association of Licensed Investigators (CALI), which has 50 investigators in the San Francisco chapter and over 2,000 members statewide. I am a retired correctional sergeant with 20 years of experience working in the California Department of Corrections and Rehabilitation.

3. I am 57 years old. I am a San Francisco native, and I am familiar with the Tenderloin District.

4. I understand that the Tenderloin District is a 50-city block neighborhood that is bordered on the west by Van Ness Avenue, on the north by Post Street, and on the east by Mason Street. On the south side, the Tenderloin District is bordered partially by Market Street and partially by McAllister Street.

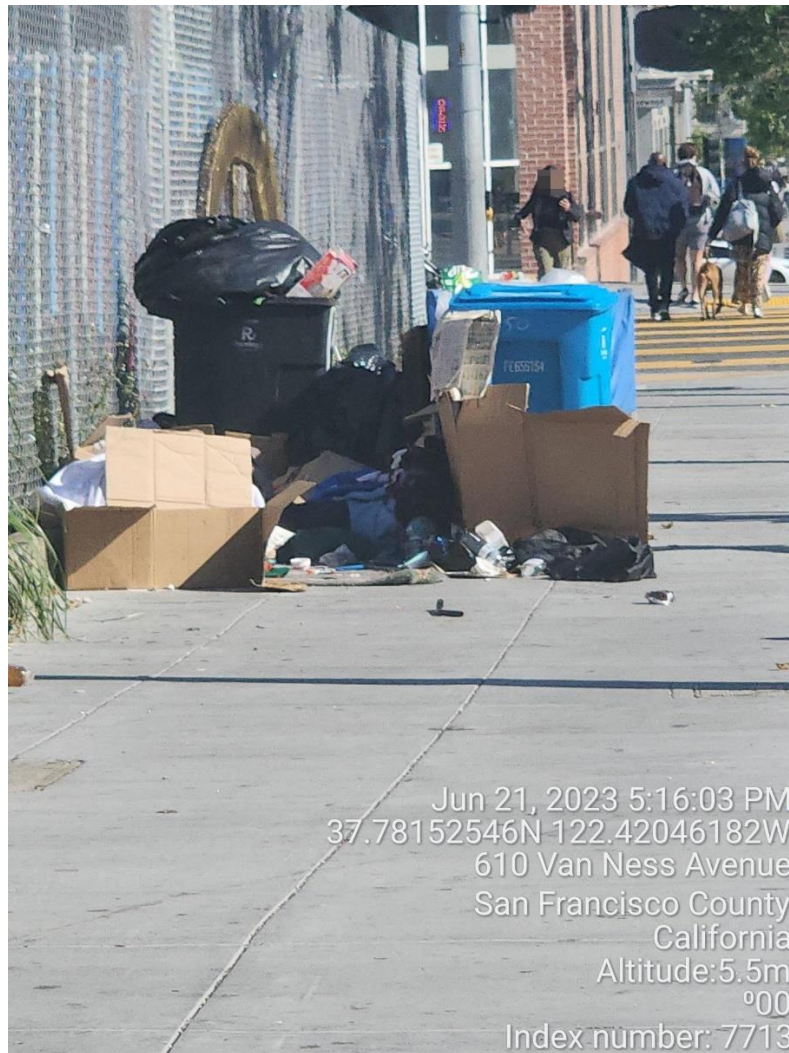
5. My assignment in this matter was to canvass the streets and alleys of the Tenderloin District and to photo-document: (1) instances of tents, encampments, or similar blockages of the sidewalks; and (2) evidence of what appeared to be illicit drug use, drug sales or public intoxication, based on my training, experience and background.

6. The photographs contained in this declaration all fairly depict what I saw. All the photographs show what was in the public view. I was nevertheless discreet in taking the photographs out of respect for the persons being photographed and being mindful of the risks associated with photographing people who appeared to

be engaged in criminal activity. The faces of people depicted in the photographs contained in this declaration have been blurred.

7. The following photographs fairly and accurately depict instances that I personally observed of tents, encampments, or similar blockages of the public sidewalks in the Tenderloin:

a. The photograph below, labeled Photograph 1, was taken on June 21, 2023 at approximately 5:16 p.m. It shows part the east sidewalk of Van Ness Avenue near Elm Street. This photo shows a makeshift encampment made up of a recycling bin, a garbage bin, boxes, and other materials. Garbage was strewn all about. I observed two individuals sheltering inside this encampment.



Photograph 1

i. The photograph below, labeled Photograph 1(a), was taken on June 22, 2023 at approximately 7:07 a.m. This photo shows the inside of the makeshift encampment shown in Photograph 1. In the foreground, a person is sleeping on some pillows with various personal items strewn on cardboard. Another person is also sleeping on the other side of the encampment. Between the two of them, there appears to be drug paraphernalia. This photo was taken at the same location as Photograph 1.



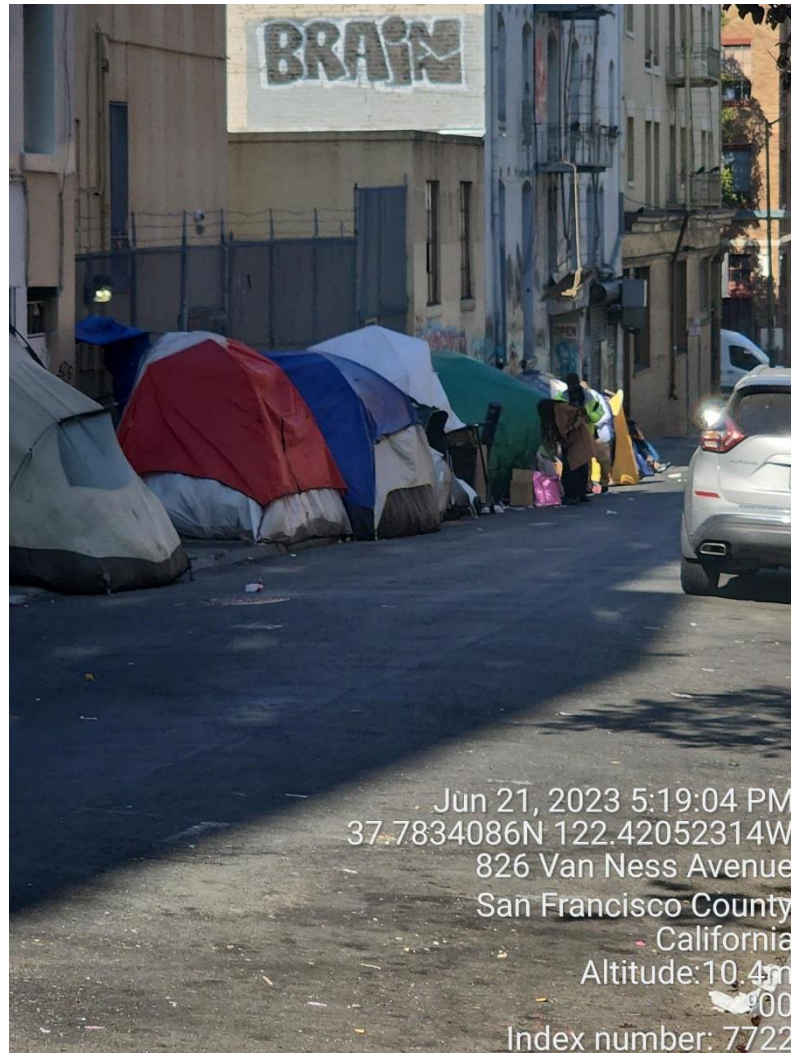
Photograph 1(a)

b. The photograph below, labeled Photograph 2, was taken on June 21, 2023, at approximately 5:17 p.m. This photo shows a line of nine tents and encampments on the north side of Redwood Street between Van Ness Avenue and Polk Street. The sidewalk is completely impassable because of these tents and encampments:



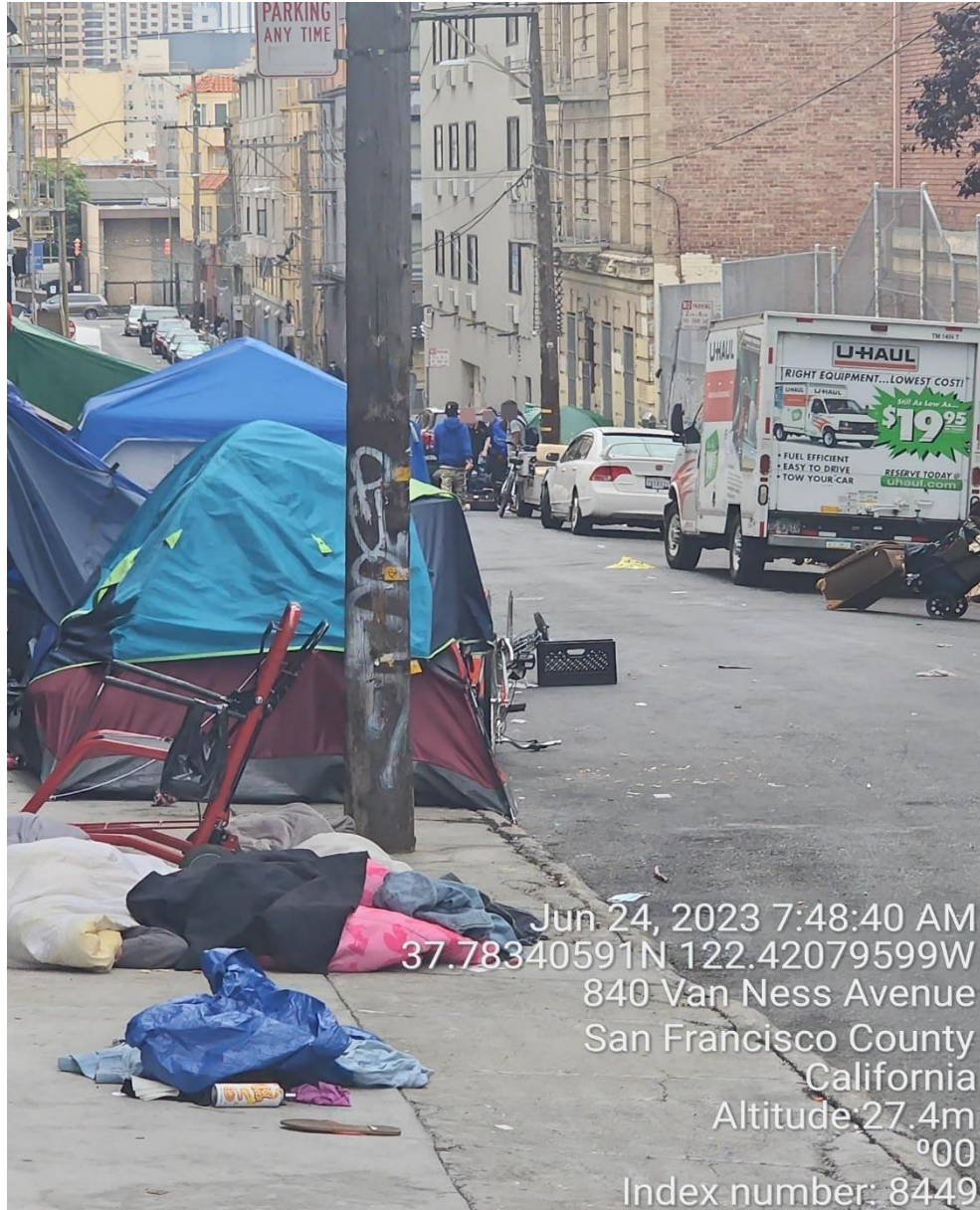
Photograph 2

c. The photograph below, labeled Photograph 3, was taken on June 21, 2023 at approximately 5:19 p.m. This photo shows a closer shot of the tents and encampments on Redwood Street shown in Photograph 2:



Photograph 3

i. The photograph below, labeled Photograph 3(a), was taken on June 24, 2023 at approximately 7:48 a.m. and shows the same general location as Photograph 3.



Photograph 3(a)

d. The photograph below, labeled Photograph 4, was taken on June 21, 2023 at approximately 5:19 p.m. and shows the north sidewalk of Willow Street between Van Ness Avenue and Polk Street. This person in the foreground sits on the sidewalk next to a garbage bag and a large concrete divider and appears to be using illegal narcotics. He completely blocks the sidewalk. Further down the street, the sidewalk is blocked completely by tents and encampments set up next to the concrete dividers. The people sitting on the dividers appeared to be engaged in illicit drug activities.



e. The photograph below, labeled Photograph 5, was taken on June 21, 2023, at approximately 5:21 p.m. This photo shows a large blue tent on the sidewalk on Polk Street near the corner of Willow Street:



Photograph 5

f. The photograph below, labeled Photograph 6, was taken on June 21, 2023 at approximately 5:28 p.m. This photo shows two tents and a woman peeking into the tent on the right side. A man with a beige hat appears to be waiting for the woman to retrieve something from the tent. He is standing near a black bike. These tents are located on the south side of the sidewalk on the 700 block of Eddy Street:



Photograph 6

g. The photograph below, labeled Photograph 7, was taken on June 21, 2023 at approximately 5:38 p.m. on Myrtle Street between Polk and Larkin Streets. This photo shows a green tarp covering a shopping cart between two large pillars on the north side of Myrtle. Another blue tarp covers what looks like trash bags to the far left. Further down Myrtle there are three tents. The sidewalk is impassable.



Photograph 7

h. The photograph below, labeled Photograph 8, was taken on June 21, 2023 at approximately 5:16 p.m. and shows the north sidewalk of Myrtle Street between Larkin and Polk Streets. (It is viewing the same area as Photograph 8 but from the other end of the street. This photo shows five tents completely obstructing the sidewalk. A man leaning on a bike appears to be looking inside the tent at the end of this row. Trash was also littered around the tents. Street. The sidewalk was



Photograph 8

impassable.

i. The photograph below, labeled Photograph 9, was taken on June 21, 2023 at approximately 5:39 p.m. This shows the south sidewalk of Myrtle Street between Polk Street and Larkin Street. This photo shows a large box with a tarp over it which appeared to be storage or a makeshift living space or both. There is luggage next to the blue tarp and a man standing beside a roller bag and a blue tent. The sidewalk is impassable.



Photograph 9

j. The photograph below, labeled Photograph 10, was taken on June 21, 2023 at approximately 5:42 p.m. This photo shows a couch with bedding. In front of the couch is a rug extending to the end of the sidewalk and a chair next to the couch. There is also a crate that appears to have trash inside of it. To the right of the couch, there is also a machine that looks like an air purifier. This photo was taken on the north sidewalk of Cedar Street between Polk Street and Larkin Street.



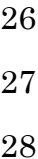
Photograph 10

k. The photograph below, labeled Photograph 11, was taken on June 21, 2023 at approximately 5:42 p.m. This photo shows a green tent blocking the sidewalk. Further down, there is quite a bit of trash and large metal barrels. This was taken on the north side of Cedar Street between Polk Street and Larkin Street.



Photograph 11

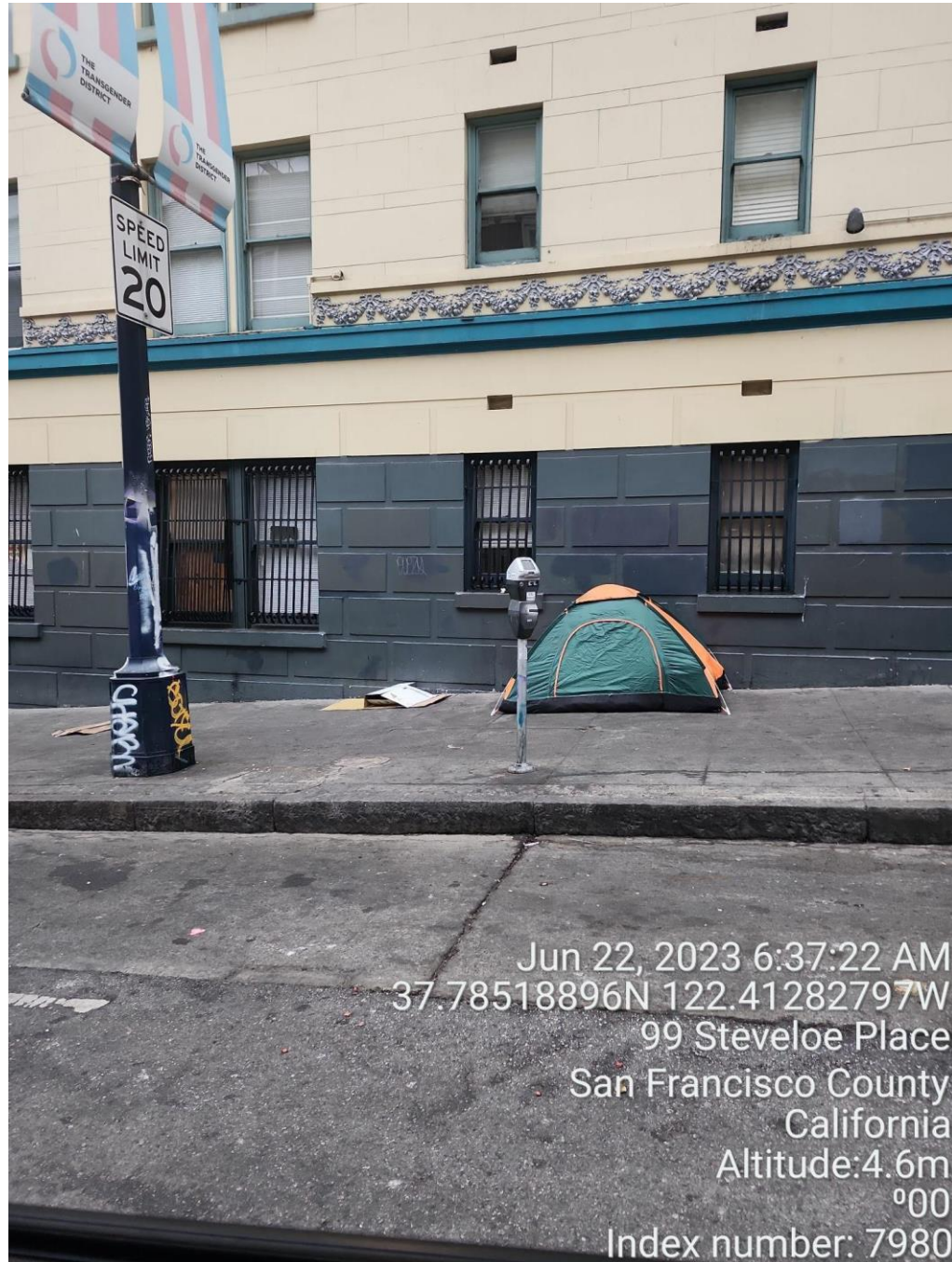
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m. The photograph below, labeled Photograph 13, was taken on June 22, 2023 at approximately 6:37 p.m. The photograph shows a green tent and some cardboard boxes strewn around. This was taken on the west sidewalk of Jones Street between Ellis Street and O'Farrell Street.



Photograph 13

n. The photograph below, labeled Photograph 14, was taken on June 22, 2023 at approximately 6:40 p.m. This photograph shows a blue and green tent with a hand truck next to it. To the tent's left, another makeshift area is covered by a green tarp with a chair and bike underneath. The tents are on the east sidewalk of Jones Street between Ellis and Eddy Street.



Photograph 14

o. The photograph below, labeled Photograph 15, was taken on June 22, 2023 at approximately 6:38 p.m. This photograph shows a person sleeping on a mattress on the sidewalk as another person walks by. There is bedding, a blanket, pillows, and some clothes visible on the mattress. A bottle of some dark liquid is also on the sidewalk near the mattress. This photograph was taken on the northeast corner of Ellis Street and Leavenworth Street.



Photograph 15

p. The photograph below, labeled Photograph 16, was taken on June 22, 2023 at approximately 6:40 p.m. This photo shows a makeshift encampment with a blue tarp that occupies both the sidewalk and part of the street. There are also various pieces of furniture blocking the sidewalk behind the encampment. There appear to be trash bags behind the encampment as well. This was taken on Jones Street, and the encampment is on the east sidewalk of Jones Street between Ellis Street and Eddy Street.



Photograph 16

q. The photograph below, labeled Photograph 17, was taken on June 22, 2023 at approximately 6:41 p.m. This photo shows a person sleeping on the sidewalk with some bedding and clothes around him. This was taken on the northwest corner of the intersection of Jones Street and Eddy Street, across from the San Francisco Police Department's Tenderloin substation.



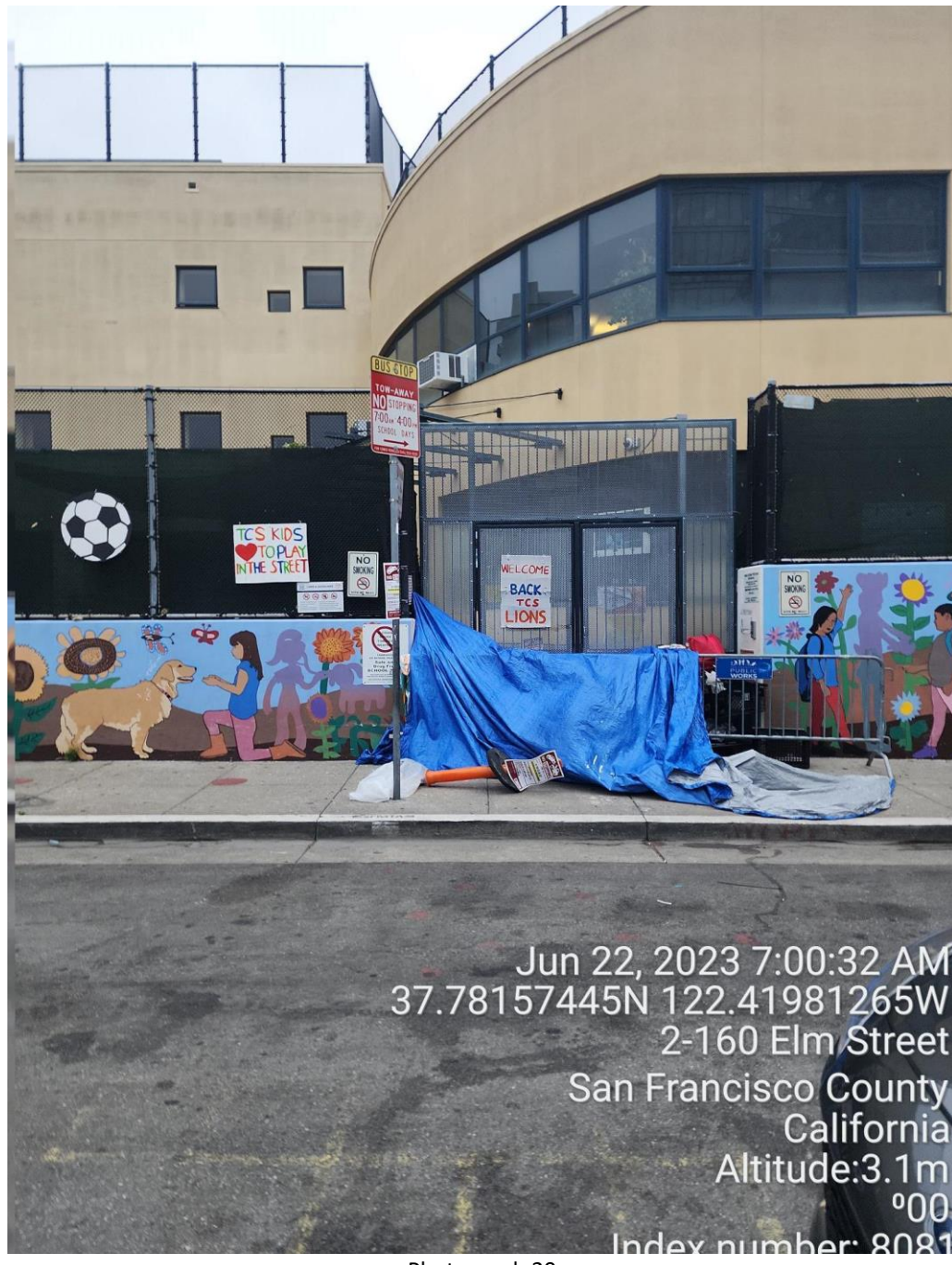
Photograph 17

r. The photograph below, labeled Photograph 18, was taken on June 22, 2023 at approximately 6:41 p.m. This photo shows a large blue tent with a stroller next to it outside a business called Yemen Kitchen and Hung Phat Bakery & Coffee. A man is hunched over at the entrance to the tent. In front of him, a large amount of trash is covering the sidewalk. To the left of the tent is a tarp hanging on window bars that appears to be an encampment. This photo was taken on the east sidewalk of Jones Street between Eddy Street and Turk Street.



Photograph 18

t. The photograph below, labeled Photograph 20, was taken on June 22, 2023 at approximately 7:00 p.m. This photo shows an encampment with a tarp blowing in a strong wind. This photograph was taken in front of Tenderloin Community Elementary School at the entrance on the north side of Elm Street between Polk Street and Van Ness Avenue.



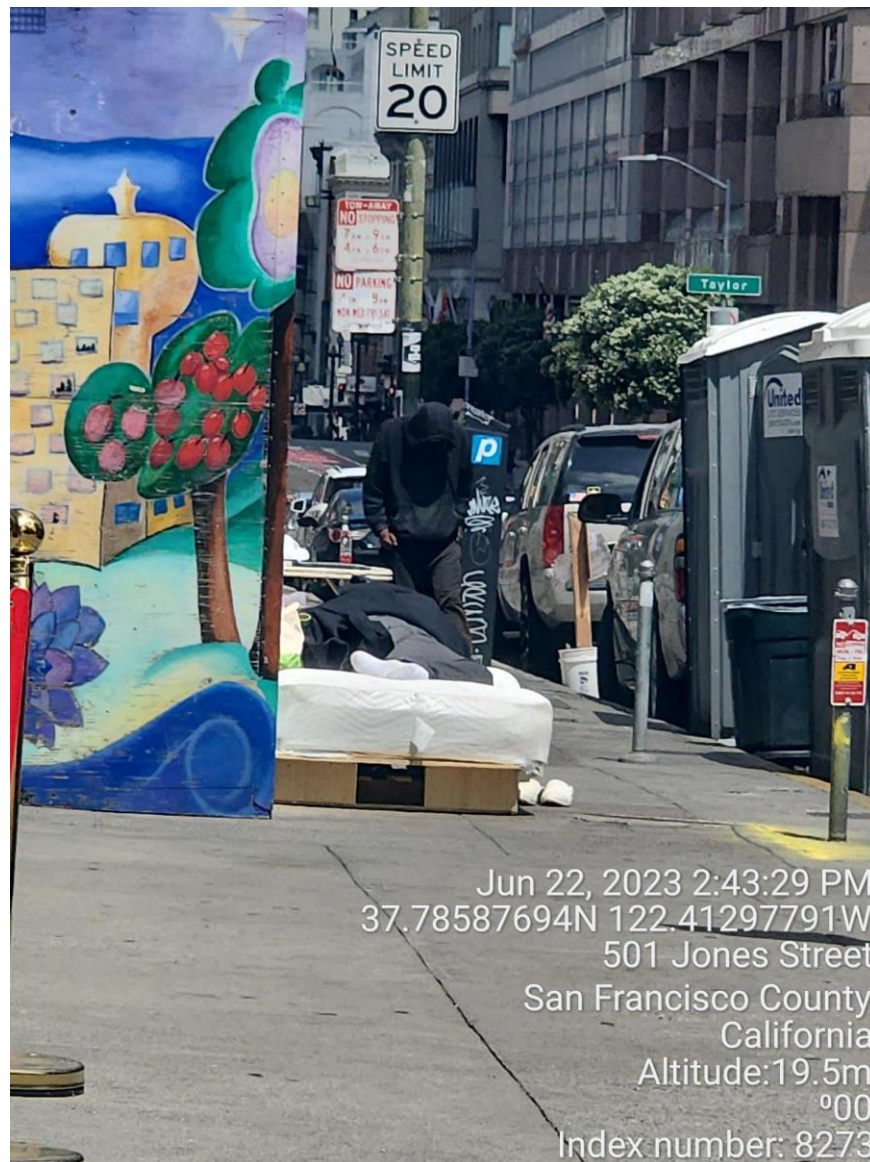
Photograph 20

u. The photograph below, labeled Photograph 21, was taken on June 22, 2023 at approximately 6:59 p.m. This photo shows a smaller, makeshift encampment of two garbage cans and a large cloth. This photo was taken on the north sidewalk of Elm Street between Polk Street and Van Ness Avenue.

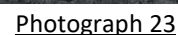


Photograph 21

v. The photograph below, labeled Photograph 22, was taken on June 22, 2023 at approximately 2:43 p.m. This photo shows a person sleeping on a mattress on the sidewalk. There also appear to be some personal items on the couch with him. This photo was taken on the north sidewalk of O'Farrell Street between Jones and Taylor Streets, where the sidewalk narrows because of a large wooden structure coming out from a building.



Photograph 22



x. The photograph below, labeled Photograph 24, was taken on June 24, 2023 at approximately 7:36 a.m. This photo shows two tents outside the sidewalk that mostly obstruct the walkway. There appears to be a trashcan full of items between the two of them. This photo was taken on the west sidewalk of Leavenworth Street between Ellis Street and Eddy Street while walking south on Leavenworth Street.



Photograph 24

y. The photograph below, labeled Photograph 25, was taken on June 24, 2023 at approximately 7:39 a.m. This photo shows a tent and automobile seat on the sidewalk in front of an art gallery called Modernism. This tent is located on the north sidewalk of Ellis Street between Polk Street and Larkin Street.



Photograph 25

z. The photograph below, labeled Photograph 26, was taken on June 24, 2023 at approximately 7:40 a.m. This photo shows encampments completely obstructing the sidewalk. Debris and trash litter the ground and the street. There is a person passed out on a sofa. This photo was taken on the north sidewalk of Ellis Street between Polk and Larkin Streets.



Photograph 26

aa. The photograph below, labeled Photograph 27, was taken on June 24, 2023 at approximately 7:40 a.m. This photo shows a tent on the north sidewalk of Ellis Street between Polk Street and Larkin Street.



Photograph 27

bb. The photograph below, labeled Photograph 28, was taken on June 24, 2023 at approximately 7:52 a.m. This photo shows two green structures tied to a road sign. There are two suitcases outside the structure as well. This photograph was taken on the north sidewalk of Myrtle Street between Van Ness Avenue and Polk Street. Specifically, the tents are on the northeast corner of the intersection of Myrtle Street and Polk Street.



Photograph 28

cc. The photograph below, labeled Photograph 29, was taken on June 24, 2023 at approximately 7:52 a.m. This photo shows two blue tents along the north sidewalk of Myrtle Street between Polk Street and Larkin Street.



Photograph 29

dd. The photograph below, labeled Photograph 30, was taken on June 24, 2023 at approximately 7:53 a.m. This photo shows one orange tent completely obstructing the sidewalk. There is also a wheelbarrow with a black plastic bag in front of the tent. This photo was taken on the north sidewalk of Myrtle Street between Polk Street and Larkin Street.



Photograph 30

JOAN RUYLE
415.404.7313
www.joanruyle.com - DBE #01878802

51

Jun 24, 2023 7:59:06 AM
37.78566542N 122.41408741W
575 O'Farrell Street
San Francisco County
California
Altitude: 17.6m
Index number: 8467

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ff. The photograph below, labeled Photograph 32, was taken on June 24, 2023 at approximately 8:04 a.m. This photo shows one flipped-over tent blocking the ramp onto the sidewalk and a grey tent with red trimming. A chair is outside the grey tent, and there appears to be no way through the sidewalk without walking between the two tents. This photo was taken on the northeast corner of the intersection between Eddy Street and Taylor Street.



Photograph 32

1 gg. The photograph below, labeled Photograph 33, was taken on June
 2 24, 2023 at approximately 8:05 a.m. This photo shows a collapsed grey tent with
 3 various pieces of the tent sprawled out to the left. There is also an upside-down pink
 4 bike and a suitcase to the left of the tent. This tent is located on the east sidewalk of
 5 Taylor Street between Ellis Street and Eddy Street.



26 Photograph 33

1 8. The following photographs fairly and accurately depict instances of what
2 appeared to be illicit drug use, drug sales, or public intoxication, based on my
3 training, experience, and background:

4 a. The photograph below, labeled Photograph 34, was taken on June
5 21, 2023, at approximately 5:15 p.m. It depicts the same general encampment area as
6 in Photograph 1, supra, and also shows about six individuals who appeared to be
7 associated with the encampment and/or were involved in the use or sale of illegal
8 narcotics. The encampment and associated debris made it physically difficult for
9 pedestrians to pass the area on the sidewalk. Anyone who did walk by this
10 encampment would have good cause to feel intimidated and unsafe. I note that an
11 elementary school is a short distance from this site.

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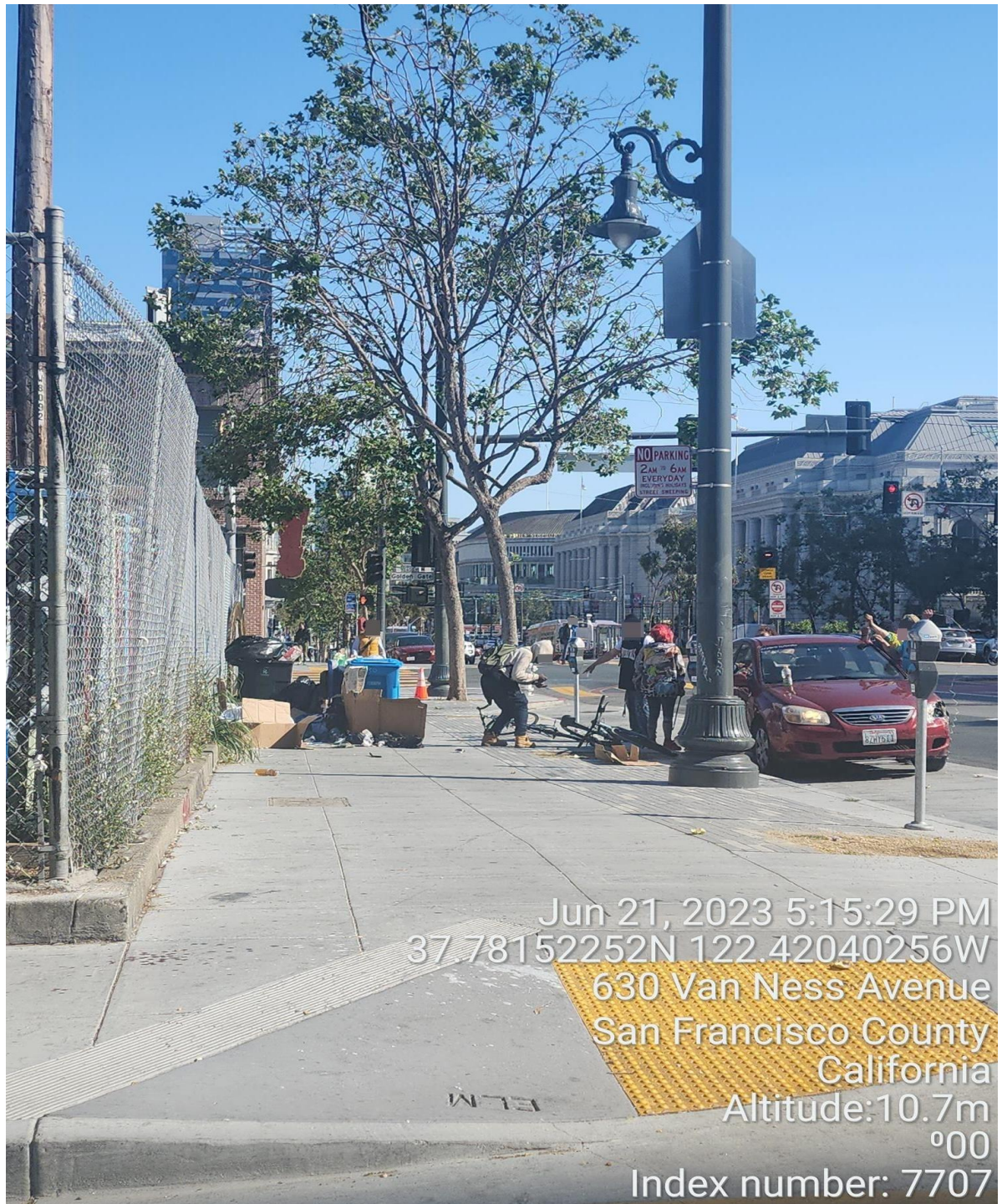
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Photograph 34

b. The photograph below, labeled Photograph 35, was taken on June 21, 2023, at approximately 5:14 p.m. This photo shows two people, one slumped over in a wheelchair and the other sitting on the ground. The individual in a wheelchair is inhaling from a pipe and heating drugs on a piece of foil. The second individual is assisting the individual smoking the pipe by using their hand to block the wind. These two individuals appear to be using illegal narcotics. This photo was taken on the south sidewalk of Elm Street between Van Ness Avenue and Polk Street. This location is right across the street from the Tenderloin Community Elementary School.



Photograph 35

c. The photograph below, labeled Photograph 36, was taken on June 21, 2023, at approximately 5:16 p.m. Based on my experience and belief, this person is using illegal narcotics on the sidewalk. He has a listless stare and is not moving around. This photo was taken on the west sidewalk of Van Ness Avenue between Eddy Street and Turk Street.



Photograph 36

d. The photograph below, labeled Photograph 37, was taken on June 21, 2023, at approximately 5:21 p.m. This photo shows a person injecting illegal narcotics into their arm on the sidewalk with a makeshift tourniquet tied at their elbow. The individual injecting drugs appears to be holding a pipe. There also appears to be a needle on the ground at his leg. The individual to the left looks to be holding a lighter as well. This photo was taken on the north sidewalk of Willow Street between Van Ness Avenue and Polk Street.



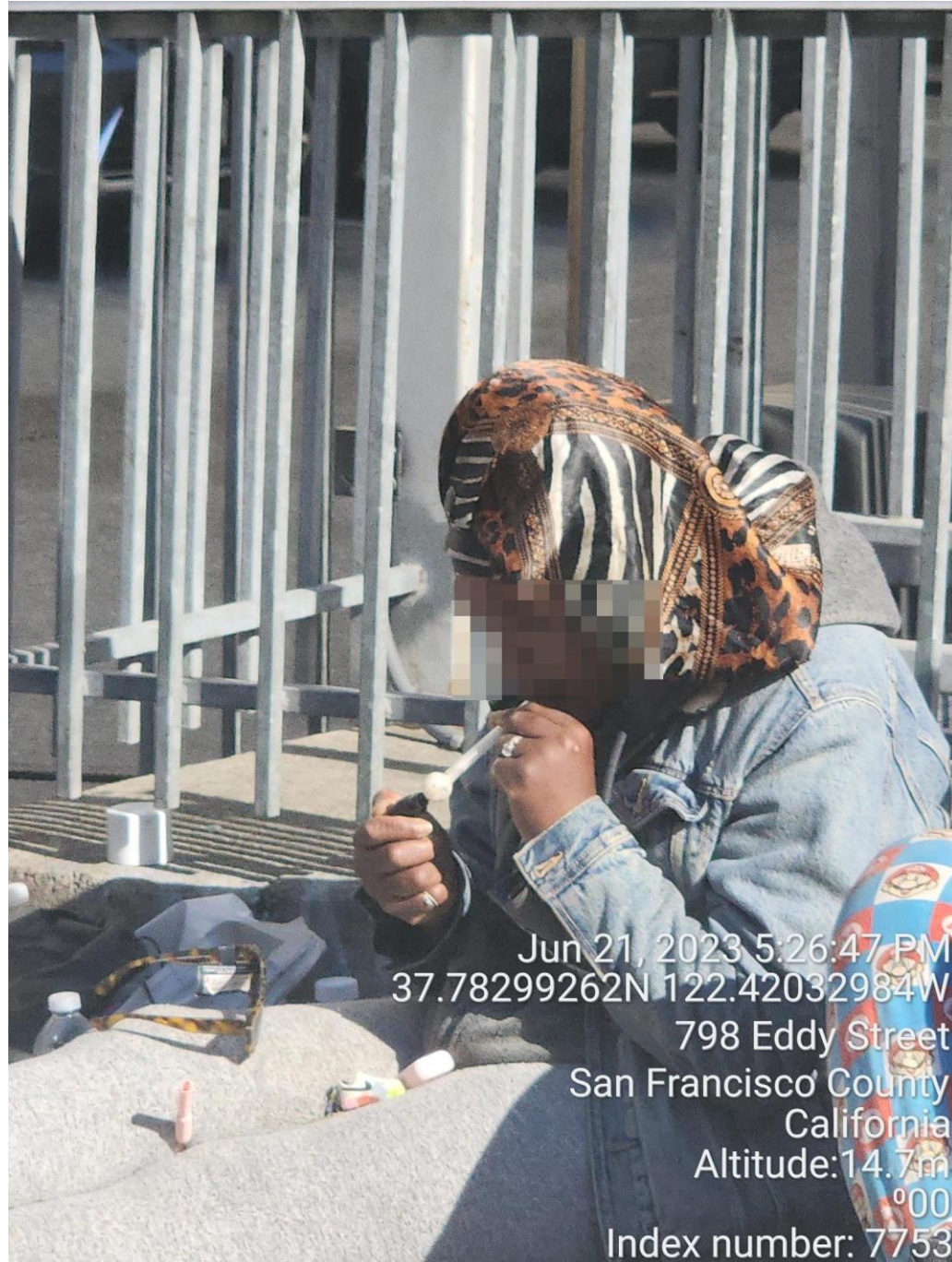
Photograph 37

1 e. The photograph below, labeled Photograph 38, was taken on June
2 21, 2023, at approximately 5:23 p.m. This photo depicts seven individuals, all of
3 whom I believe were engaged in the illegal use of narcotics. The third individual from
4 the right has his hands clasped together and is holding something to his mouth,
5 which I believe to be a pipe. This photo was taken on the south sidewalk of Eddy
6 Street between Van Ness Avenue and Polk Street.



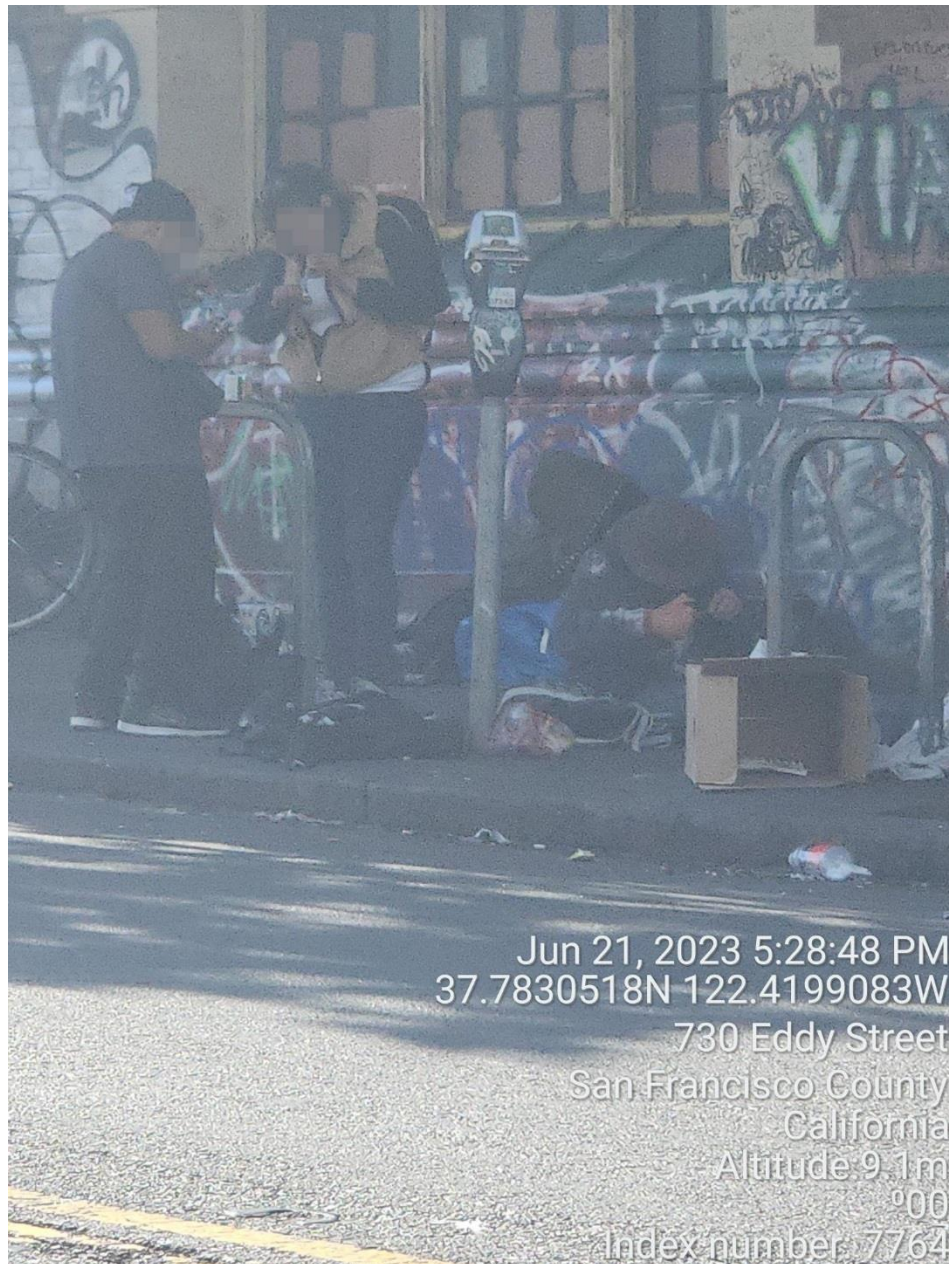
27 Photograph 38

1 f. The photograph below, labeled Photograph 39, was taken on June
2 21, 2023, at approximately 5:26 p.m. This photo shows a woman smoking something
3 out of a pipe which I believe to be illegal narcotics. This photo was taken at the same
4 location as Photograph 37.



27 Photograph 39

1 g. The photograph below, labeled Photograph 40, was taken on June
2 21, 2023, at approximately 5:28 p.m. This photo shows four individuals, two smoking
3 a substance from a foil holder or pipe. I believe these individuals to be smoking
4 illegal narcotics. This photo was taken on the north sidewalk of Eddy Street between
5 Van Ness Avenue and Polk Street.



27 Photograph 40

h. The photograph below, labeled Photograph 41, was taken on June 21, 2023, at approximately 5:30 p.m. This photograph shows an individual on an electric scooter who I believe is a dealer of illegal narcotics. Behind him is a man in all black who appears to be unconscious, holding something in his hand that looks like foil used to melt down illegal narcotics. This photograph was taken at the northwest corner of Eddy Street and Polk Street.



Photograph 41



j. The photograph below, labeled Photograph 43, was taken on June 21, 2023, at approximately 5:26 p.m. This photo shows individuals I believe to be engaged in selling illegal narcotics. The individual in the white hooded sweatshirt appears to be handing something to the man in the wheelchair. The individual in the red hooded sweatshirt seems to be holding drug paraphernalia. This photo was taken on the north sidewalk of Eddy Street between Van Ness Avenue and Polk Street. This location is in front of the City College of San Francisco.



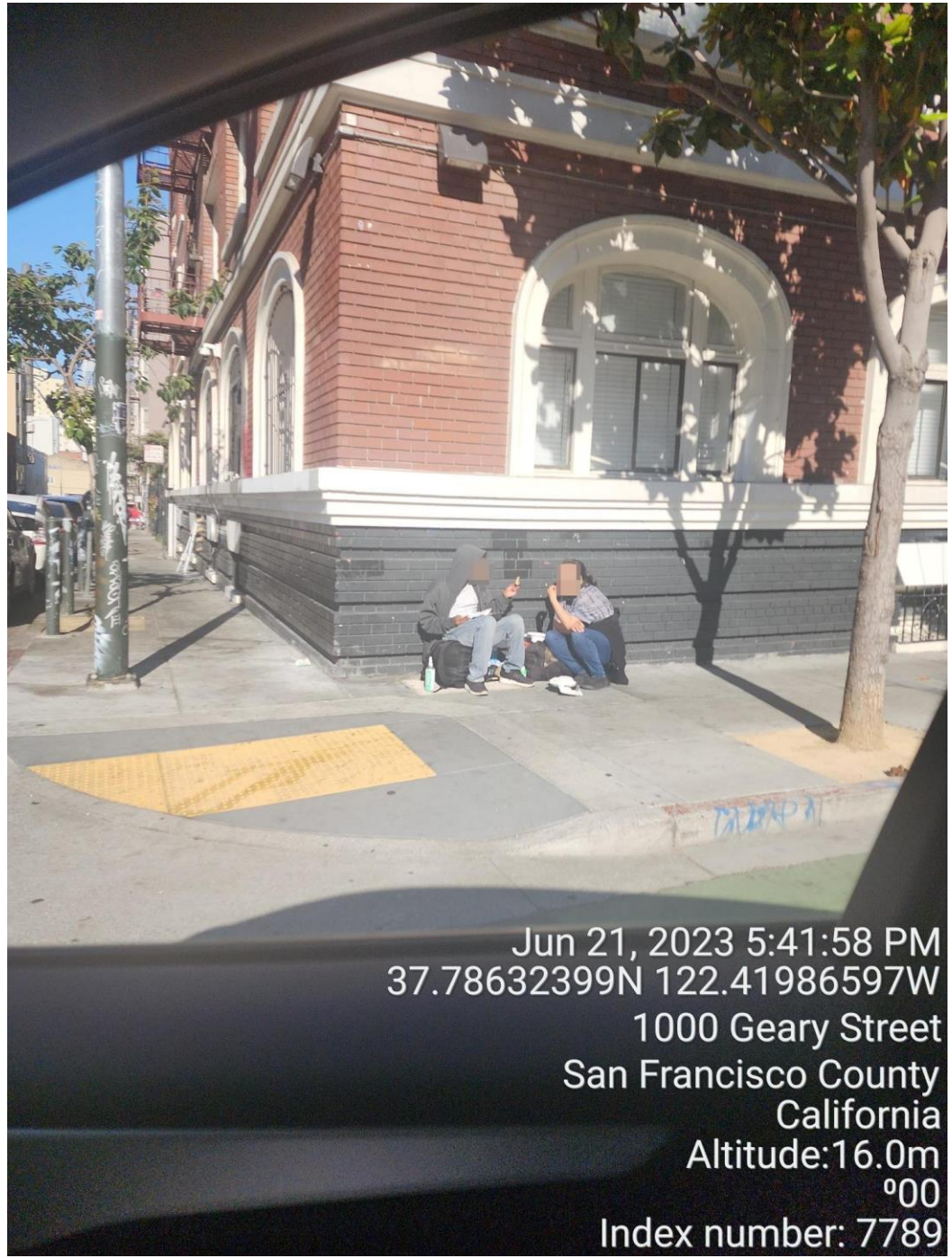
Photograph 43

k. The photograph below, labeled Photograph 44, was taken on June 21, 2023, at approximately 5:26 p.m. This photo shows an individual convulsing while standing up. They are hunched over and appear to be under the influence of illegal narcotics. The individual in all-black clothing to the standing person's left is also hunched over. I believe this individual is also under the influence of illegal narcotics. This photo was taken on the north sidewalk of Eddy Street between Van Ness Avenue and Polk Street. This location is in front of the City College of San Francisco.



Photograph 44

m. The photograph below, labeled Photograph 46, was taken on June 21, 2023, at approximately 5:41 p.m. This photo shows two individuals I believe to be using illegal narcotics. This photo was taken at the northeast corner of Geary Street and Polk Street.



Photograph 46

n. The photograph below, labeled Photograph 47, was taken on June 22, 2023, at approximately 6:29 a.m. This photo shows an individual hunched over his hands. I believe this individual is smoking illegal narcotics and that he is holding a piece of tin foil used for the melting and smoking of illegal narcotics. This photo was taken on Golden Gate Avenue near UC Law SF.



Photograph 47

o. The photograph below, labeled Photograph 48, was taken on June 22, 2023, at approximately 6:45 a.m. This photo shows two individuals. The individual in the pink shirt is knelt on the sidewalk next to a bottle of what appear to be prescription pills. The individual with the ripped blue jeans is hunched over and is carrying a bag. Based on my experience, I believe these two individuals are under the influence of illegal narcotics. This photo was taken on the north sidewalk of Turk Street between Leavenworth Street and Jones Street.



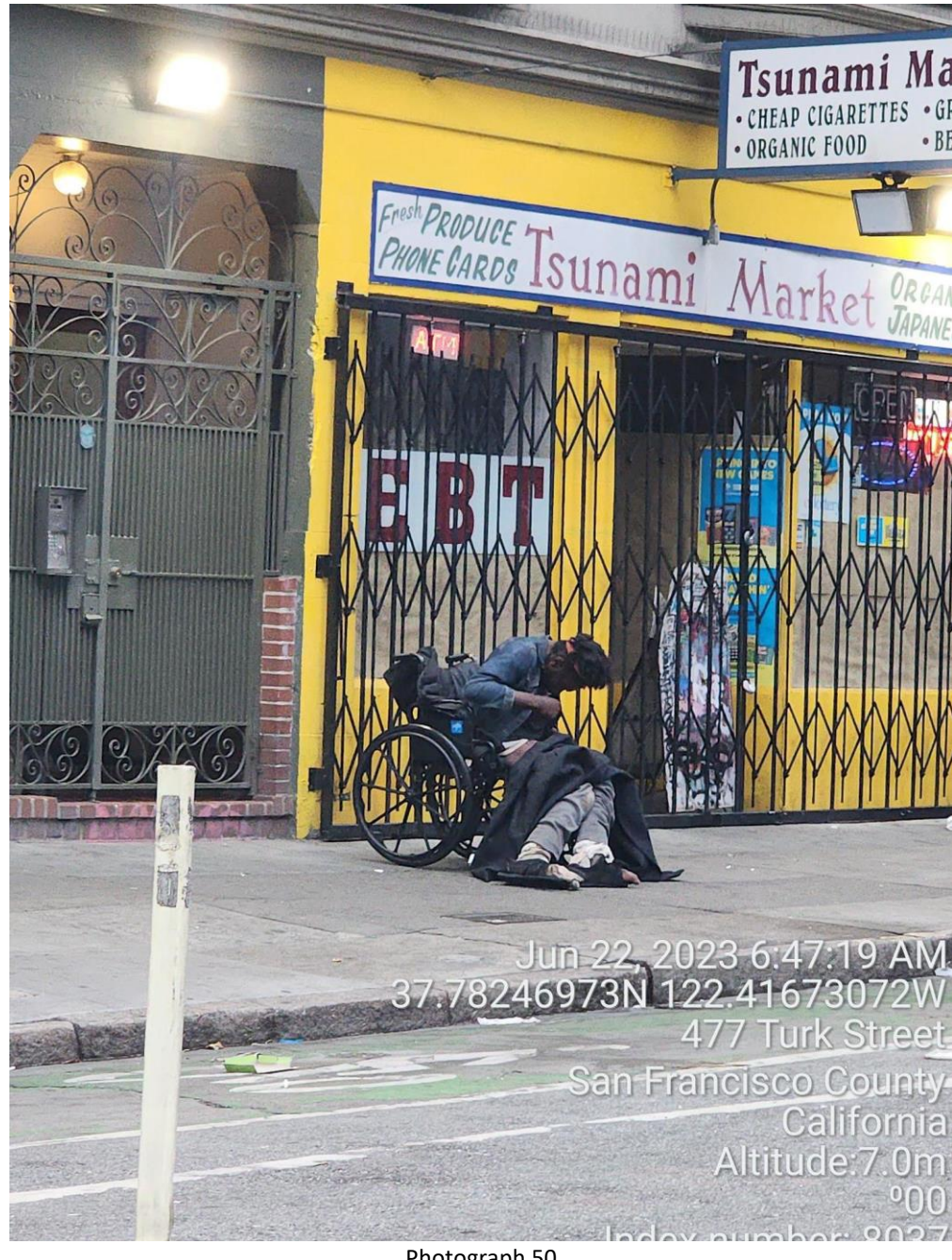
Photograph 48

p. The photograph below, labeled Photograph 49, was taken on June 22, 2023, at approximately 6:48 a.m. This photo shows a man with a large blue blanket covering his body. He appears to be holding a beverage in his hands. Based on my experience and the way he is hunched over, I believe this man to be under the influence of illegal narcotics. This photo was taken on the north sidewalk of Turk Street between Larkin Street and Hyde Street.



Photograph 49

q. The photograph below, labeled Photograph 50, was taken on June 22, 2023, at approximately 6:47 a.m. This photo shows an individual in a wheelchair holding something up to his face. Based on my experience, I believe that this individual is actively using illegal narcotics. This photo was taken on the south sidewalk of Turk Street between Larkin Street and Hyde Street.



Photograph 50

r. The photograph below, labeled Photograph 51, was taken on June 22, 2023, at approximately 6:49 a.m. This photo shows two individuals standing near the entrance to the Phoenix Hotel. Based on my experience, I believe that these individuals are engaged in the sale of illegal narcotics. This photo was taken on the south sidewalk of Eddy Street between Larkin Street and Hyde Street.



Photograph 51

s. The photograph below, labeled Photograph 52, was taken on June 22, 2023, at approximately 6:47 a.m. This photo shows an individual hunched over and leaning against the wall of a bus stop. His hand is near his mouth like he is coughing into it. Based on my experience, I believe this individual is under the influence of illegal narcotics. This photo was taken on the north sidewalk of Turk Street between Larkin Street and High Street.



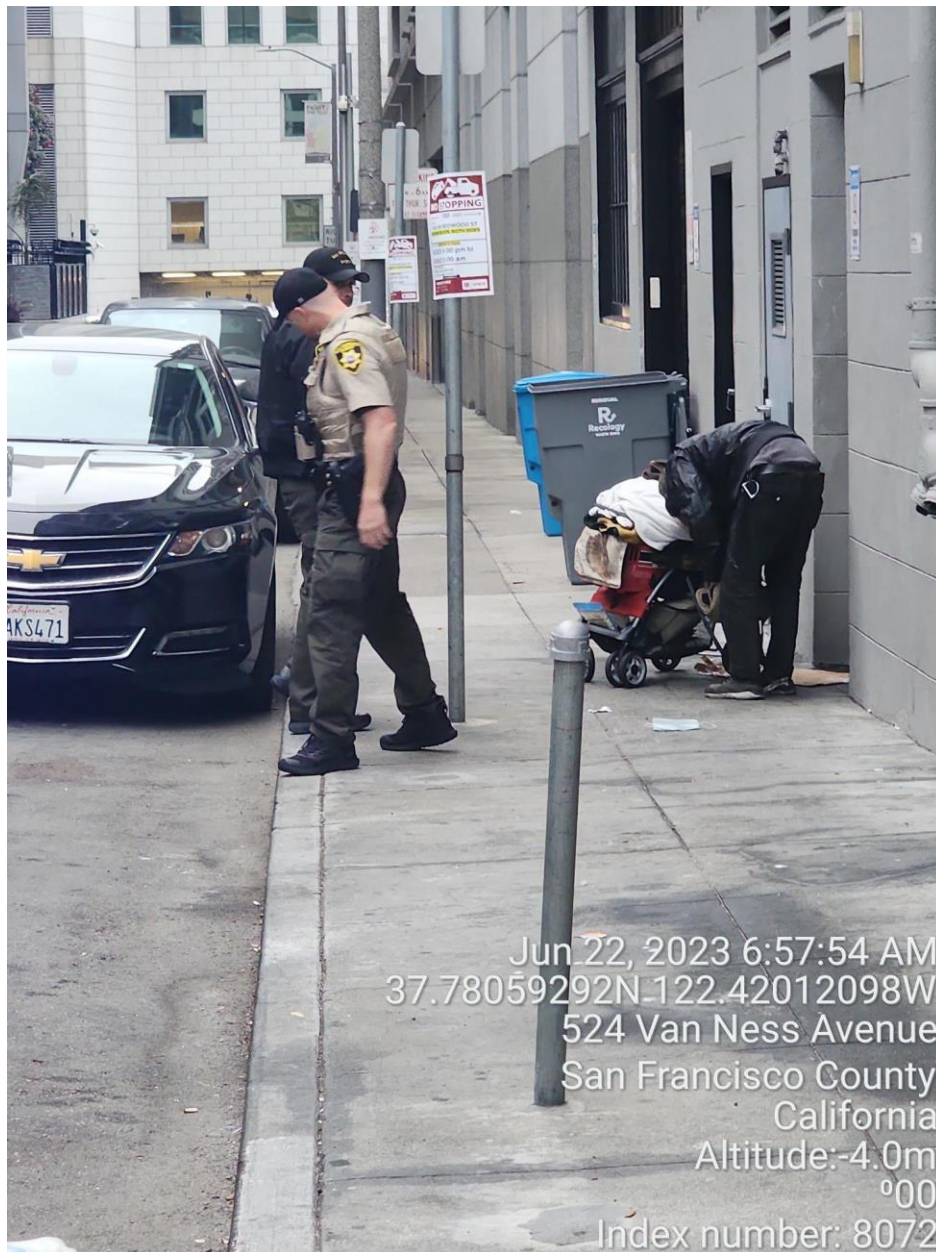
Photograph 52

t. The photograph below, labeled Photograph 53, was taken on June 22, 2023, at approximately 6:54 a.m. This photo shows an individual sitting on the sidewalk with drug paraphernalia in his hands. He has a lighter in his right hand, which he is holding underneath a piece of metal foil. He also has something in his mouth. I believe this individual is actively using illegal narcotics. This photo was taken at the intersection of Eddy Street and Larkin Street.



Photograph 53

u. The photograph below, labeled Photograph 54, was taken on June 22, 2023, at approximately 6:57 a.m. This photo shows an individual leaning on a baby stroller on the right. There are two individuals to the left, one of which appears to be a law enforcement officer. Based on my experience, I believe this individual is under the influence of illegal narcotics. This photo was taken on the south sidewalk of Redwood Street between Van Ness Avenue and Polk Street.

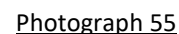


Photograph 54

i. The photograph below, labeled Photograph 54(a), was taken on June 22, 2023, at approximately 6:57 a.m. This photo shows the same individual as before now collapsed on the sidewalk. There also appears to be drug paraphernalia left on top of the baby stroller. This photo was taken at the same location as Photograph 53.



Photograph 54(a)



w. The photograph below, labeled Photograph 56, was taken on June 22, 2023, at approximately 7:48 a.m. This photo shows two individuals, one on an electric scooter and the other pointing toward something. The pointing individual appears to have a needle in her left hand. Based on my experience, I believe these two individuals are engaged in the sale and/or use of illegal narcotics. This photo was taken on the north sidewalk of Eddy Street between Van Ness Avenue and Polk Street.



Photograph 56

x. The photograph below, labeled Photograph 57, was taken on June 22, 2023, at approximately 12:35 p.m. This photo shows five individuals. The person with the blonde hair appears to be hunched over. Based on my experience, I believe the individual to the far left, the one wearing a black shirt to the left of the telephone pole, and the person with blond hair are all under the influence of illegal narcotics. This photo was taken on the east sidewalk of Polk Street between Ellis Street and Willow Street in front of the San Francisco Community Health Center.



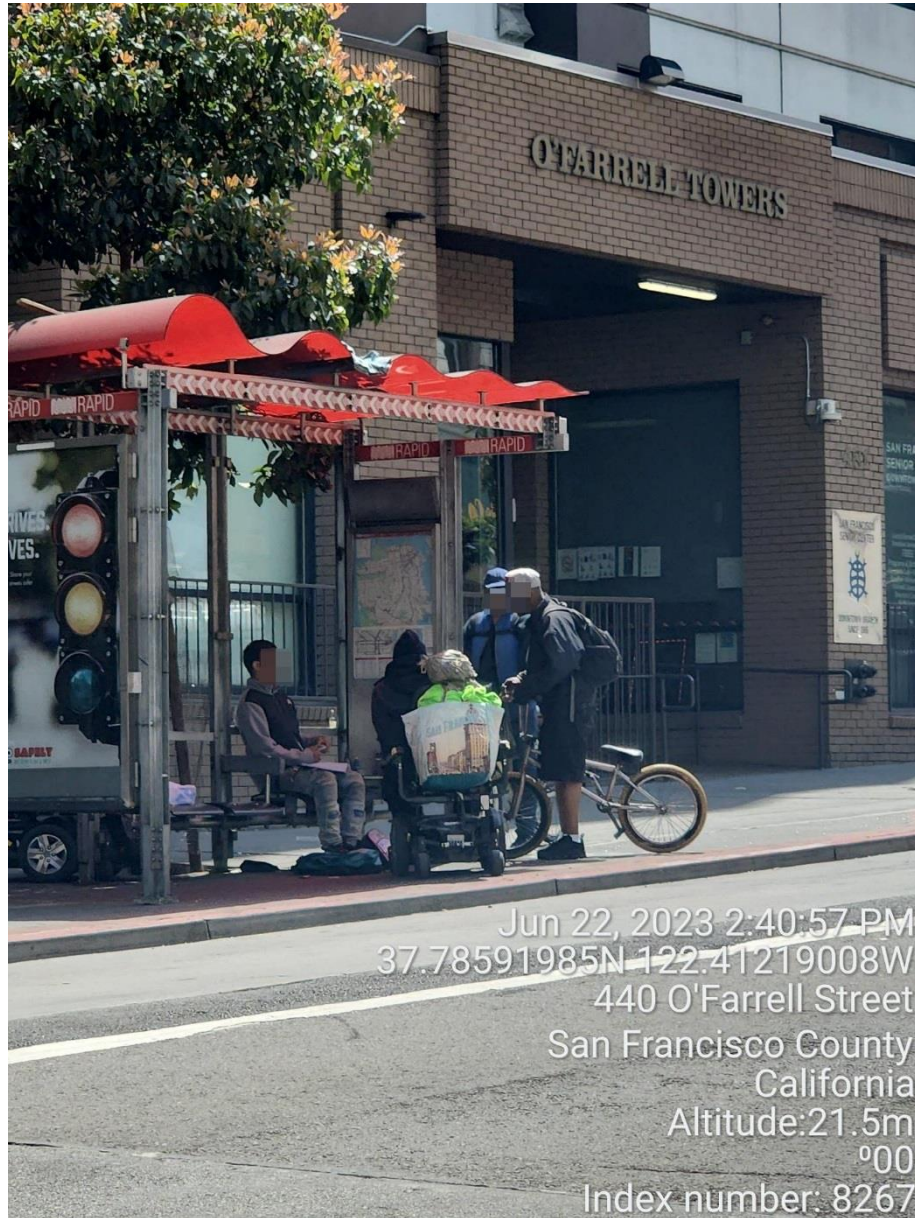
Photograph 57

y. The photograph below, labeled Photograph 58, was taken on June 22, 2023, at approximately 12:38 p.m. This photo shows two individuals lying down on the sidewalk in the middle of the walkway. Both individuals appear to be unconscious and, based on my experience, under the influence of illegal narcotics. This photo was taken on the west sidewalk of Polk Street between Redwood Street and McAllister Street. This sidewalk runs alongside the San Francisco Superior Courthouse.



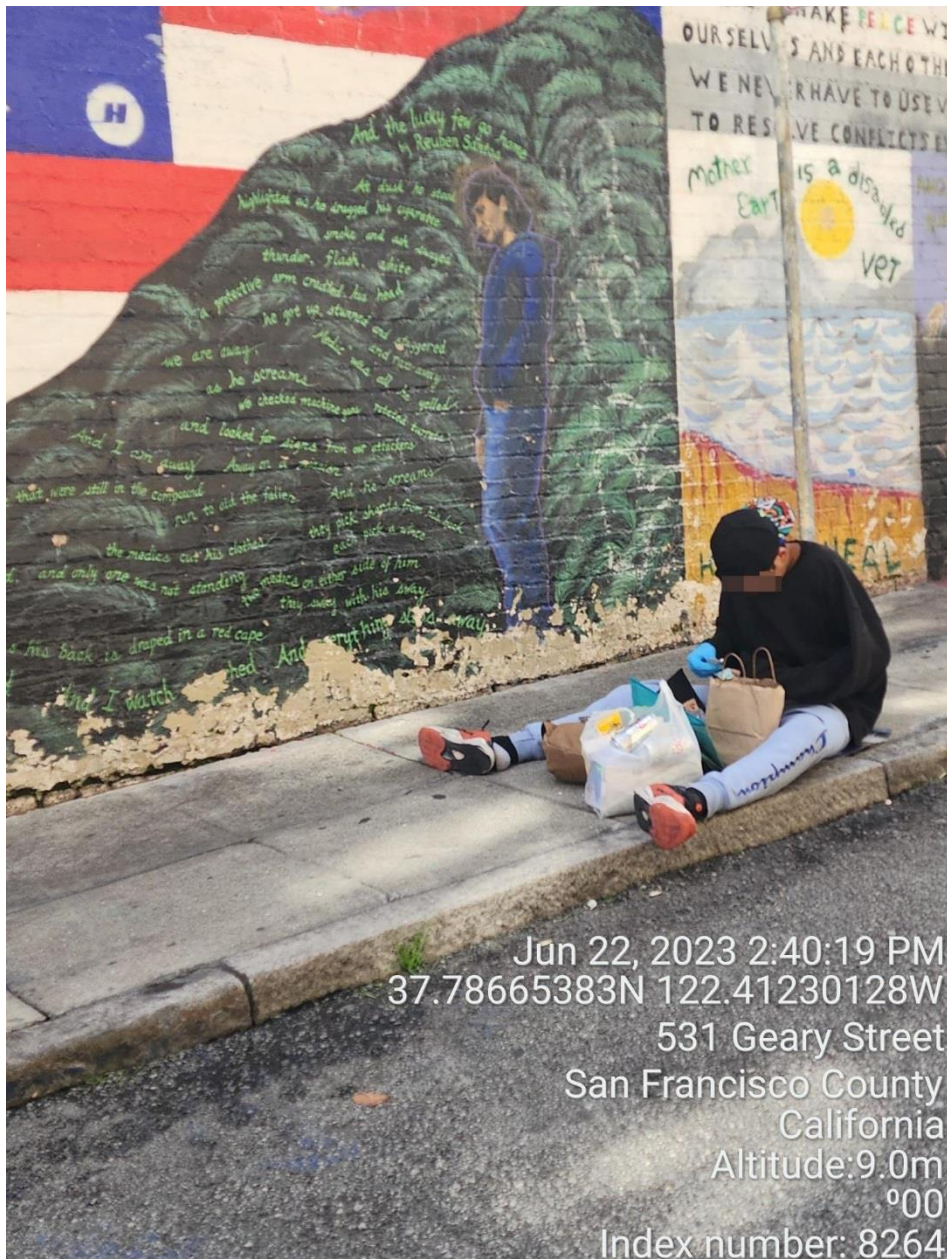
Photograph 58

z. The photograph below, labeled Photograph 59, was taken on June 22, 2023, at approximately 2:40 p.m. This photo shows four individuals at a bus stop. Based on my experience and knowledge, I believe these individuals are engaged in selling illegal narcotics. This photo was taken at the O'Farrell Towers on the south sidewalk of O'Farrell Street.



Photograph 59

1 aa. The photograph below, labeled Photograph 60, was taken on June
 2 22, 2023, at approximately 2:40 p.m. This photo shows an individual sitting on the
 3 sidewalk wearing blue gloves. He appears to be preparing to use illegal narcotics. In
 4 his right hand, there is a small piece of reflective metal. Based on my experience, I
 5 believe that he is using illegal narcotics. This photo was taken on the east sidewalk of
 6 Shannon Street near the intersection of Shannon Street and Geary Street.



Photograph 60

1 bb. The photograph below, labeled Photograph 61, was taken on June
 2 22, 2023, at approximately 2:45 p.m. This photo shows an individual sitting down
 3 and holding something in his right hand that appears to be drug paraphernalia.
 4 Based on my experience, I believe this person is using illegal narcotics. This photo
 5 was taken on the south sidewalk of O'Farrell Street near the intersection of O'Farrell
 6 Street and Taylor Street.



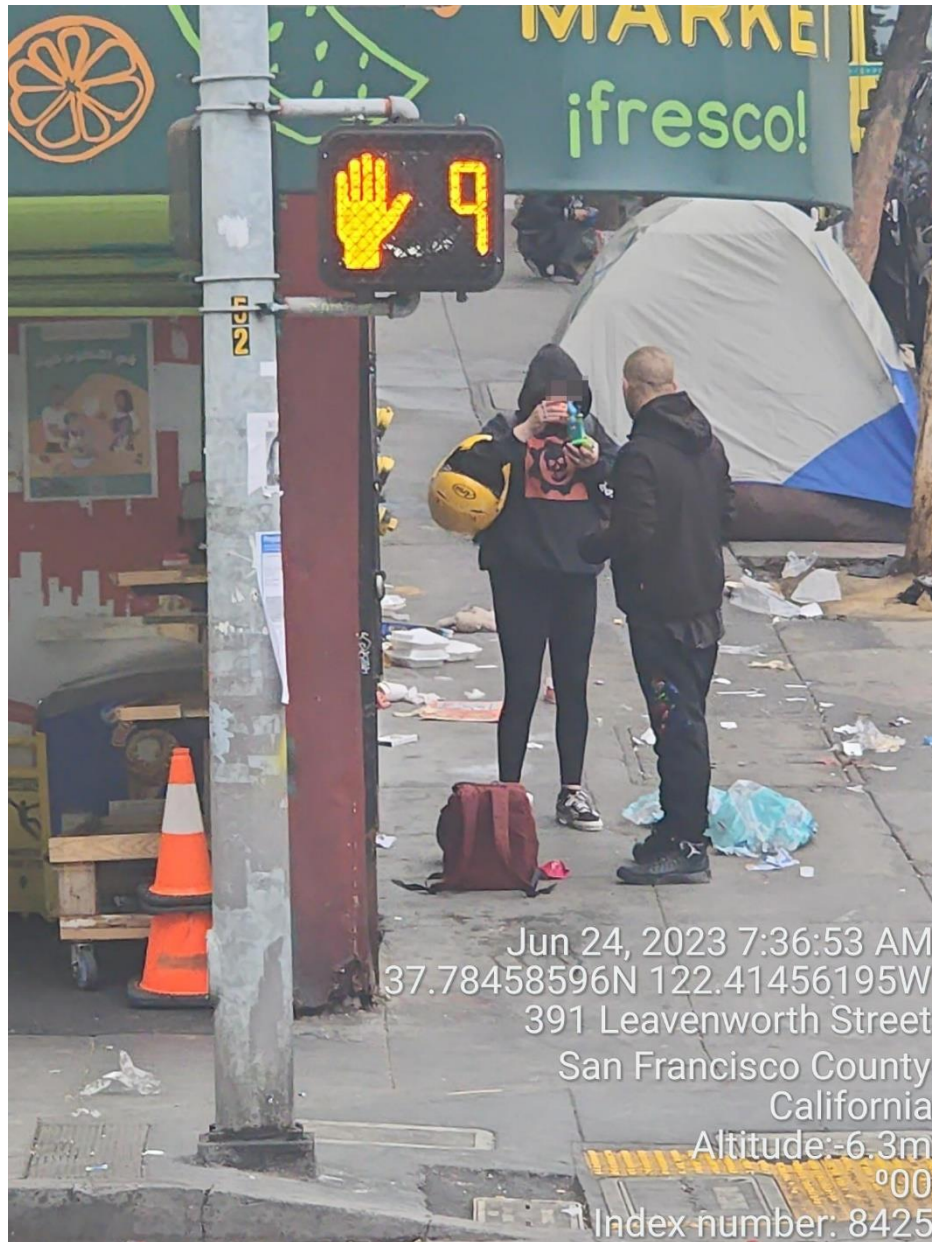
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Photograph 61

cc. The photograph below, labeled Photograph 62, was taken on June 24, 2023, at approximately 7:33 a.m. This photo shows multiple individuals. The three on the very right-hand side of the photo appear to be engaged in the illegal sale and/or use of narcotics. The person with the gray hooded sweatshirt appears bent over, and they seem to be holding drug paraphernalia. This photo was taken on the northeast corner of Leavenworth Street and Turk Street in front of a business called Maryland Market.



Photograph 62

dd. The photograph below, labeled Photograph 63, was taken on June 24, 2023, at approximately 7:36 a.m. This photo shows two individuals standing on the sidewalk in front of a gray and blue tent. The individual on the left smokes from a blue and green apparatus while the other watches. Based on my experience, I believe these individuals are engaged in using illegal narcotics. This photo was taken on the northeast corner of the intersection of Leavenworth Street and Ellis Street.



Photograph 63

1 ee. The photograph below, labeled Photograph 64, was taken on June
 2 24, 2023, at approximately 7:45 a.m. This photo shows an individual in a green
 3 trench coat hunched over a wheelchair. This individual is clutching something in
 4 their right hand, which appears to be a lighter. Based on my experience, I believe
 5 this person is under the influence of illegal narcotics. This photo was taken on the
 6 north sidewalk of Eddy Street between Van Ness Avenue and Polk Street.



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Photograph 64

ff. The photograph below, labeled Photograph 65, was taken on June 24, 2023, at approximately 7:53 a.m. This photo shows two individuals sitting on cardboard on the sidewalk. One appears to be smoking a cigarette while the other is using a tool in his right hand on something in his left hand. Under the individual on the right, there appears to be a lighter. Based on my experience, I believe these individuals are engaged in actively using illegal narcotics. This photo was taken on the north sidewalk of Myrtle Street between Polk Street and Larkin Street.



Photograph 65

1 gg. The photograph below, labeled Photograph 66, was taken on June
 2 24, 2023, at approximately 7:54 a.m. This photo shows an individual sitting on the
 3 curb of a sidewalk with a lighter in his right hand. He also appears to have
 4 something in his mouth that could be drug paraphernalia. Based on my experience, I
 5 believe this individual is actively using illegal narcotics. This photo was taken on the
 6 southeast corner of the intersection of Geary Street and Larkin Street. This photo
 7 was taken half a block from a children's park.



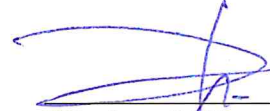
Photograph 66

1 children's park.

2 I declare under penalty of perjury under the laws of the United States
3 of America that the foregoing is true and correct to the best of my
4 knowledge.

5 Executed on this 3rd day of July, 2023, at San Francisco, California.

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Lindon Lilly